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February 9, 2024

**VIA ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Juan Orlando Hernandez, et al*, 15 Cr. 379 (PKC)

Dear Judge Castel:

I write to request the appointment of Sabrina Shroff, Esq. as additional counsel, pursuant to the Criminal Justice Act. The reason for this request is that neither I, nor Raymond Colon, Esq., have classified security clearance that allows us to address some of the recent issues that have come up. It has become clear to me that we need cleared counsel as a member of the defense, who can effectively litigate these issues, especially in light of the most recent classified document production. I request that Ms. Shroff be appointed under CJA for all work performed on or after the date of my own CJA appointment, which was January 23, 2024.

I thank the Court for its continued consideration.

Respectfully submitted,

/s/

Renato C. Stabile

cc: All counsel  
via ECF